

OFFICE OF
GENERAL COUNSEL

Baboucar Taal

March 22, 2019

2019 MAR 29 PM 12:03

Bedford, NH 03110

Office of General Counsel,
Federal Election Commission,
999 E Street, N.W.,
Washington, D.C. 20463.

Re: MUR 7500

Dear Committee Members:

Complainant here posit these additional information in support of the "patronage system" as detailed in the Amended Complaint that I believe this Credit Union; St Mary's Bank, it's top Management and Board control and directs, a Campaign Finance Violations within the FEC jurisdiction per Federal Election Campaign Act of 1971 as amended. Here the NH AG is refusing to do/ conduct a basic investigation of the aforementioned NH "patronage system".

Herein are the other statutes, the foremost in addition to the already stated violation of and conspiracy to violate FEC Act: *See attch letter to NH AG.*

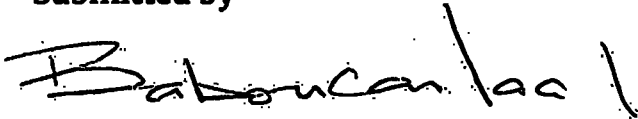
1) "Honest services fraud is a crime defined in 18 U.S.C. § 1346 (the federal mail and wire fraud statute), added by the United States Congress in 1988, which states: "The term scheme or artifice to defraud includes a scheme or artifice to deprive another of the intangible right of honest ..." § 371 - Conspiracy to Defraud The United States - The operative language is the so-called "defraud clause," that prohibits conspiracies to defraud the United States. This clause creates a separate offense from the "offense clause" in Section 371. Both offenses require the traditional elements of Section 371 conspiracy, including an illegal agreement, criminal intent, and proof of an overt act.

2) Summary: Discovery was sought from candidate for federal office Ovide Lamontagne as the Chairman of St Mary's Bank; a [NH] state chartered credit union. Candidate Lamontagne with a [NH] law license, rather than comply with said discovery requested, went contacted state judge Abramson ex parte, as he Lamontagne worked with her for then state governor Merrill. Abramson use the powers of the state judiciary as a state [actor] judge to issue a blanket "ex parte restraining order" barring plaintiff (me) from all any

discovery provided in state court rules in an ongoing case in a USA tribunal, rather they conspire to wantonly and knowingly violate plaintiff's due process right. See attch "ex parte restraining..." In effect state judge Gillian Abramson who with personal and professional relationship with candidate Lamontagne is ruling for St Mary's Bank, providing direct (tangible- a \$1000 and undeclared - a (distraction of) legal civil case to disappear) benefit. The former benefit at a time that she and her husband could barely afford it for failure to pay their real estate taxes for 2+years a tax lien on the property about to be auction.

3) "Embodied in the guarantee of an Impartial Tribunal is the ABSOLUTE RIGHT to a proceeding conducted by a judge Free of Bias or Pecuniary Motivation. Ward v. Village of Monroe, 409 U.S. 57, 61-62, 93 S. Ct. 80, 34 L. Ed. 2d 267 (1972); Tumey v. Ohio, 273 U.S. 510, 532, 47 S. Ct. 437, 71 L. Ed. 749 (1927).

Submitted by



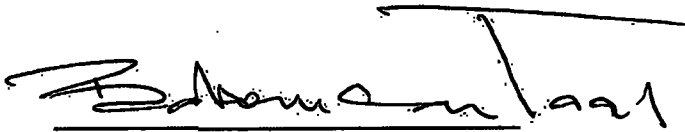
Baboucar Taal

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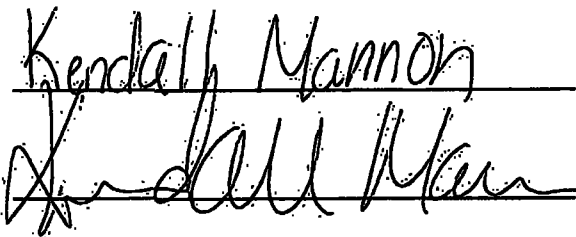
State of New Hampshire
County of Hillsborough

I, Baboucar Taal, hereby sworn to, and signed in the presence of a notary public, that the complaint is true to the best of my knowledge, executed by:



Baboucar Taal

Subscribed and sworn to, before me on this 23 day of March, 2019





Notary Public

My Commission expires: Sept 27 2022

10034747-410034

APPENDIX

100444-51001

Baboucar Taal

December 8, 2018

Bedford, NH 03110

**Gordon J. MacDonald, NH-AG
33 Capitol Street, Concord, NH 03301**

Dear Mr Attorney General:

1) On September 16, 2018, I filed a formal complaint against a state judge; Gillian Abramson and detailed the violations of [federal & state] laws and NH very own specific statute; RSA 643:1

You and your office have neither acknowledge said formal complaint nor opened an inquiry into, said credible allegation.

2) Further evidences also indicated that the same or similar facts that not only made the conduct of Gillian Abramson a wilful and knowing violation of Conflict of Interest; 18 U.S.C. §1346, § 371, §4, NH RSA 643:1... These same facts I proffer do mirror your set of circumstances; i.e. that you also personally know and is familiar and donated a significant amount to this Ovide Lamontange, [SMB Chairman], to his seeking US (federal office) Senate campaign..., and St Mary's Bank is a state chartered [Credit Union] financial institution.

3) To the extent that you personally also have conflicts of Interest like Gillian Abramson, please advise but more important there must Career prosecutors in the NH Attorney General's Office or in the Interest of Justice to Referred the case other County Attorney.

4) I will add that though the identical set of facts and evidence you share with 'state actor' Abramson, and apart from the failure by you or your office [NH-AG] to acknowledge a formal complaint, the comparison seem to stop there unless evidence supports otherwise.

5) Abramson engaged wanton wilful misconduct [violation of federal[incl. rights] and NH state law] despite her felony 'conflicts of interest' and at the very time she and her family engage in straw campaign donation, they couldn't afford, a FEC Act violation.

6) This is quoted on the NH AG site next to your picture: *"The mission of the department is to serve the people of New Hampshire with diligence, independence and integrity by performing the constitutional, statutory and common law duties of the Attorney General as the State's chief legal officer and chief law enforcement officer, to seek to do justice in all prosecutions, ... and the rights of its consumers, and to provide ... leadership of New Hampshire law enforcement"*. Thus complaint(s) filed at NH-doj makes it your Legal obligation to investigate and prosecute without regards unless..

7) Further another case against Neiderman et was before Gillian Abramson, and your office has all the proof of "fraud on the courts" where upon this lawfirm goes before problem judge(s) like Abramson and carry the day despite evidences, facts and the law because they share, "with regards" the very opposite of what the US Constitution and federal law, Rights and Protections states, must be "without regards to ethnicity, race, origin" Though NH it's we speak of; DueProces/Equal Protection is limited to the connected

8) Again I urge you as legally obligated to acknowledge and initiate a **credible Investigation** into problem judges who use their Public Offices blatantly violates federal rights, laws and statutes to enrich themselves and or whoever pays. Your office expense resources to prosecuted a judge who submitted falsified "reviews" online??? I will forward the complaint to the USDOJ-PIS and OGC-FEC as the NH AG again fail to response along with all the evidences garner.

Submitted by, _____


Baboucar Taal

Cc:

THE STATE OF NEW HAMPSHIRE

Hillsborough, SS

Case No. 216-2011-CV-741

Robbicus Tual

v.

St. Mary's Bank

**ORDER ON EX PARTE PETITION FOR TEMPORARY RESTRAINING
ORDER AND PRELIMINARY AND PERMANENT INJUNCTIONS**

Upon the Court's review of the facts presented to it, it is satisfied that because of Tual's conduct in the case at bar, Employees/Representatives/Agents of St. Mary's Bank and other innocent individuals, including Lori Ullasz and other members of Attorney Ullasz's family outside of the purview of this case are suffering and will continue to suffer irreparable harm, unless the threatening actions of Plaintiff immediately cease. Consequently, on the date and time specified below, the Court orders Mr. Tual to immediately:

1. To cease threatening and intimidating St. Mary's Bank Employees, Agents, and Representatives.
2. To direct any and all communication regarding the litigation to Attorney Gregory T. Ullasz, counsel for St. Mary's Bank.
3. Other than for the purpose of conducting regular business activities at St. Mary's Bank, to cease and desist from any and all direct communication and/or contact with Bank employees, agents, representatives, including, but not limited to Donald St. Germain, Rita Brinson, Rhine Zogopoulos, Ronald Covey, current CEO, and Attorney Ovide Lamontagne.
4. Stay at least 1000 feet away from Lori Ullasz, or any member of the Ullasz family, other than Gregory T. Ullasz, in the course of this litigation.
5. To cease and desist from communications with Lori Ullasz her employer or potential employer, business associates and social contacts.

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This Order issues without notice because the harm to individuals detailed in the Petition, the harm to Defendant, and harm to the interests of others Plaintiff has involved in this case would worsen with the passing of the time of such notice.

This Order shall remain in effect until judgment is entered in this case, or until further order of this Court.

Dated: January 25, 2012.

At: 11:15 a.m.

JUDICIAL OFFICIAL

Hon. L. Abramson, J.